

RECEIVED
FEDERAL ELECTION
COMMISSION

2010 APR 16 PM 3:42
FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

CELA

FIRST GENERAL COUNSEL'S REPORT

MUR 6224

DATE COMPLAINT FILED: 10/27/2009

LAST RESPONSE RECEIVED: 12/1/2009

DATE OF NOTIFICATION: 11/3/2009

DATE ACTIVATED: 1/22/2010

EXPIRATION OF SOL: 10/15/2014

COMPLAINANT:

Alberto Ramirez

RESPONDENTS:

Cara Carleton "Carly" Sneed Fiorina

RELEVANT STATUTES AND
REGULATIONS

2 U.S.C. § 431(2)

2 U.S.C. § 432(e)(1)

2 U.S.C. § 433(a)

2 U.S.C. §§ 434(a) and (b)

11 C.F.R. § 100.72

11 C.F.R. § 100.131

INTERNAL REPORTS CHECKED:

FEC Database

FEDERAL AGENCIES CHECKED:

None

I. INTRODUCTION

This matter concerns the "testing the waters" exemptions to the definitions of "contribution" and "expenditure." The exemptions permit an individual to raise and spend funds to test the feasibility of a Federal candidacy without becoming a "candidate," a determination that triggers registration and reporting requirements under the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint alleges that Cara Carleton "Carly" Sneed Fiorina ("Fiorina" or "Respondent") became a "candidate" for the U.S. Senate in California on or before September 25, 2009, and consequently failed to timely register and, through a designated

1 political committee, file financial disclosure reports with the Commission. As explained below,
2 we recommend the Commission find no reason to believe as to these allegations.

3 The complaint alleges that, by September 25, 2009, Fiorina had spent more than \$5,000,
4 the dollar threshold that triggers "candidate" status under the Act and obligatory registration and
5 reporting requirements, and had conducted activities indicating that she had decided to become a
6 candidate. The specific activities alleged were that Fiorina had (1) spent more money than
7 reasonably needed to "test the waters" and attempted to amass funds to be used after she became
8 a candidate; (2) used general public political advertising to publicize her intention to campaign;
9 (3) allowed and authorized statements by media sources that referred to her as a U.S. Senate
10 candidate and authorized statements on her website that "implied" she was a candidate; and
11 (4) conducted activities over a protracted period of time and made no effort "to disclaim her
12 efforts or intentions to run for U.S. Senate."

13 In response to the complaint, Respondent asserts that the complaint provides no evidence
14 or facts to support claims that she exceeded the scope of the "testing the waters" exemption. *See*
15 Response at 2. She states that she announced on August 17, 2009, that she would explore the
16 viability of a possible candidacy for the Republican nomination for U.S. Senate but would not
17 reach a decision until she completed treatment and follow-up care for breast cancer, which she
18 expected to complete by October 1, 2009. *See id.* at 1. Between August 17 and November 4,
19 2009, when she formally announced her candidacy, she maintains that she engaged in
20 permissible "testing the waters" activity by meeting people, sharing her views on public policy
21 issues, and getting feedback on a potential candidacy. *See id.* at 1-2. She contends that she made
22 clear during numerous public and private appearances that she had not made a decision about her
23 candidacy. *See id.*

1 Neither the limited information provided in the complaint nor publicly available
2 information supports the complaint's allegations. Although the post-complaint disclosure report
3 filed by Fiorina's principal campaign committee, Carly for California, confirms that Fiorina both
4 raised and spent more than \$5,000 before September 25, 2009, information about Ms. Fiorina's
5 activities and statements provided in the complaint and from publicly-available sources do not
6 support a conclusion that she had decided to become a candidate before she formally announced
7 her candidacy on November 4, 2009. Accordingly, we recommend that the Commission find no
8 reason to believe that Fiorina violated the Act.

9 **II. FACTUAL AND LEGAL ANALYSIS**

10 **A. Factual Summary**

11 On August 18, 2009, Carly Fiorina announced that that she had filed the name "Carly for
12 California" with the Internal Revenue Service to obtain an employer tax identification number,
13 an action she described as "a logical next step in the process of evaluating running" for the U.S.
14 Senate in California in 2010. Press Release, *Carly Fiorina Begins Formal Process of Exploring*
15 *Bid for U.S. Senate*, Aug. 18, 2009, available at <http://carlyforca.com/2009/08/fiorina-exploring>.
16 On October 2, 2009, Carly for California filed an initial Political Organization Notice of Section
17 527 Status Form with the Internal Revenue Service ("IRS") and described its purpose as "testing
18 the waters-possible federal candidacy."

19 Ms. Fiorina formally announced her candidacy on November 4, 2009, after the complaint
20 was filed but before she received it from the Commission on November 10, 2009. See
21 Response at 1. She filed a Statement of Candidacy on November 5, 2009, designating Carly for
22 California, Inc. ("the Committee") as her principal campaign committee. The Committee filed a
23 Statement of Organization the same day. The Committee's initial disclosure report, filed on

1 January 27, 2010, reflects total receipts of \$3,584,133.68 and total disbursements of \$830,517.56
2 for the period of August 18, 2009, through December 31, 2009.

3 **B. Analysis**

4 An individual becomes a candidate for federal office – and thus triggers registration and
5 reporting under the Act – when he or she has received or made in excess of \$5,000 in
6 contributions or expenditures. 2 U.S.C. § 431(2). The Commission created a limited exemption
7 to the definitions of “contribution” and “expenditure” for “testing the waters” activity, allowing
8 individuals to conduct certain activities designed to evaluate a potential candidacy. See
9 11 C.F.R. §§ 100.72 and 100.131; see also Explanation and Justification for Final Rules on
10 Payments Received for Testing the Waters Activities, 50 Fed. Reg. 9592 (Mar. 13, 1985)
11 (“*Testing the Waters E&J*”); Explanation and Justification to the Disclosure Regulations, House
12 Doc. No. 95-44, Communication from the Chairman, FEC, Transmitting the Commission’s
13 Proposed Regulations Governing Federal Elections, at 40 (Jan. 12, 1977). An individual who is
14 “testing the waters” may conduct polls, make telephone calls, and travel to determine the
15 viability of the potential candidacy, see 11 C.F.R. § 100.72(a); 11 C.F.R. §100.131(a), but need
16 not register or file disclosure reports with the Commission unless and until the individual
17 subsequently decides to run for Federal office or conducts activities that indicate he or she has
18 decided to become a candidate. All funds raised and spent for “testing the waters” activities are,
19 however, subject to the Act’s limitations and prohibitions. See *id.*

20 Commission regulations set out five non-exhaustive factors to be considered in
21 determining whether an individual has decided to become a candidate. An individual can
22 indicate that she has gone beyond “testing the waters” and has decided to become a candidate by
23 (1) using general public political advertising to publicize her intention to campaign for Federal

1 office; (2) raising funds in excess of what could reasonably be expected to be used for
2 exploratory activities or undertaking activity designed to amass campaign funds that would be
3 spent after she becomes a candidate; (3) making or authorizing written or oral statements that
4 refer to her as a candidate for a particular office, (4) conducting activities in close proximity to
5 the election or over a protracted period of time; and (5) taking action to qualify for the ballot
6 under state law. 11 C.F.R. § 100.72(b); 11 C.F.R. § 100.131(b).

7 Once an individual meets the \$5,000 threshold and has decided to become a candidate,
8 she has 15 days to designate a principal campaign committee by filing a Statement of Candidacy
9 with the Commission. See 2 U.S.C. § 432(e)(1); 11 C.F.R. § 101.1(a). The principal campaign
10 committee must then file a Statement of Organization within ten days of its designation, see
11 2 U.S.C. § 433(a), and must file disclosure reports with the Commission in accordance with
12 2 U.S.C. §§ 434(a) and (b).

13 **1. Florina's Pre-Announcement Fundraising and Spending**
14

15 The complaint alleges that on or before September 25, 2009, Florina spent more money
16 than was reasonably needed to "test the waters" and was attempting to amass funds to be used
17 after she became a candidate. See 11 C.F.R. § 100.72(b)(2); 11 C.F.R. § 100.131(b)(2). In
18 support, the complainant points to her hiring of "notable political consultants" and "retail level
19 staffers" to "recruit" at the September 2009 California GOP convention by selling t-shirts and
20 baseball caps and/or collecting donations on-line. Complainant provides no factual basis for the
21 amount of money Florina raised or spent except to allege that it was more than \$5,000.

22 The Committee's reports suggest that Florina's pre-announcement spending and
23 fundraising were consistent with "testing the waters" activity. The Committee's initial
24 disclosure report, the 2009 Year End Report, confirms that it had raised \$41,513 in itemized

1 contributions and made \$5,806 in disbursements on Fiorina's behalf as of September 25, 2009.
2 Because the disbursement dates may not accurately reflect all expenses incurred prior to this
3 date, a broader examination of the Year End Report shows that the Committee had raised a total
4 of \$611,799.25 in itemized receipts and made \$329,176.15 in disbursements before Fiorina made
5 her November 4th announcement.¹ All but \$108,463 of the pre-announcement itemized receipts
6 were comprised of a loan and small in-kind contributions for travel from Fiorina. The largest
7 categories of disbursements included \$91,066 for political strategy consulting; \$70,408 for
8 payroll and payroll insurance and taxes; \$54,935 for media/travel; \$37,072 for polling/travel;
9 \$32,176.75 for legal and compliance consulting; \$31,036 for finance consulting/travel; and
10 \$21,906 for web services. All disbursements for political strategy consulting, finance consulting,
11 media consulting, and legal consulting were made in mid-October or later.

12 With respect to the level of Fiorina's pre-announcement fundraising, the Commission has
13 previously declined to find reason to believe that an individual went beyond the "testing the
14 waters" exemption and became a candidate in matters where exploratory committees had raised
15 contributions in significant amounts. See, e.g., MUR 5934 (Thompson) (Commission dismissed
16 after a majority failed to find reason to believe where presidential committee raised \$9.52 million
17 and spent only \$2.9 million before formal candidate announcement); MUR 5930 (Schuring)
18 (Commission dismissed the complaint where committee raised \$194,000); MUR 5703
19 (Rainville) (no reason to believe where committee raised \$100,000); MUR 2710 (Judge Harvey
20 Sloane) (no reason to believe where committee raised \$200,000). Excluding Fiorina's personal
21 funds, the Committee raised at most \$224,496 from others during the pre-announcement period
22 (\$108,462 in itemized contributions and all unitemized contributions), an amount insufficient by

¹ The Committee reports receiving another \$116,033.81 in unitemized receipts, but there is no way to determine how much of that was raised before either September 25 or November 4.

1 itself to conclude that she had decided to become a candidate. Even the total \$611,799.25 in
2 funds raised that included Florina's own funds does not appear to exceed what could reasonably
3 be expected to be used for exploratory activities based on the Commission's decisions,
4 particularly for a U.S. Senate race in California, which can be expensive given the state's size
5 and extensive voting age population.²

6 Nor do Florina's activities suggest that she was attempting to amass funds for an eventual
7 candidacy. Complainant alleges that Florina's hiring of political consultants and low-level
8 staffers, who apparently sold t-shirts and hats at a "recruitment and information table" at the state
9 party convention and/or collected on-line donations, evidence an attempt to amass funds to be
10 used after she became a candidate. The Commission, however, has advised previously that
11 hiring political consultants and soliciting contributions may be permissible "testing the water
12 activities" if they are undertaken to explore the feasibility of becoming a candidate. See
13 Advisory Opinion 1981-32 (concluding that hiring political consultants to assist with advice on
14 the potential and mechanics of constructing a national campaign organization and soliciting
15 contributions to engage in "testing the waters" activities were within the scope of the testing the
16 waters exemption so long as the prospective candidate conducted the activities while continuing
17 to deliberate his decision to become a candidate).

18 The complaint provides no information that indicates Florina staffers were selling hats
19 and t-shirts or collecting on-line donations for purposes other than financing "testing the waters
20 activities." It does not describe the hats, t-shirts, or other materials or the activity conducted at
21 what it describes as a recruitment table, and we have found no publicly available information

² In the last three U.S. Senate elections held in California in 2000, 2004, and 2006, the incumbents spent \$11.8 million, \$15.13 million and \$9.4 million, respectively. Opponents in the 2000, 2004 and 2006 elections spent \$6.67 million, \$5.35 million and \$195,000, respectively.

1 about such convention activities. Similarly, there is no available information to suggest that the
2 consultants hired by Florina engaged in activities other than to assist her in exploring her
3 viability as a candidate for U.S. Senate. Indeed, the limited information available about Ms.
4 Florina's activities during this period suggests that her activities were within the "testing the
5 waters" exemption – a barebones website, *carlyforcalifornia.com*, unveiled just before the
6 convention, included a mechanism to donate on-line with a disclaimer that "contributions are
7 raised for testing the waters purpose only at this time." Kevin Yamamura, *Florina Launches*
8 *New Website: Twitter Account*, SACRAMENTO BEE, Sept. 22, 2009. While a "testing the waters"
9 disclaimer alone does not assure that contributions solicited are within the exemption, the
10 disclaimer, taken together with the facts that Ms. Florina raised only about a third of the
11 Committee's pre-announcement contributions from others and spent in excess of that amount,
12 suggest that the level of contributions was not significant enough to indicate that Florina had
13 decided to become a candidate before November 4, 2009.

14 2. General Public Political Advertising

15 The complaint alleges that Florina used general public political advertising to publicize
16 her intention to campaign, citing the use of Google ads that apparently included a declaration of
17 endorsement by former five former state Republican Party chairs. See 11 C.F.R. § 100.72(b)(1);
18 11 C.F.R. §100.131(b)(1). Although the Committee's disclosure reports state that she spent
19 \$54,935 for media/travel during this period, no Google ads featuring Florina or her candidacy,
20 including cached ads, were found in a search of publicly available information. A press release
21 at the time of the alleged ads announced that five former California Republican Party Chairmen
22 supported Florina "should she run for the U.S. Senate," but included a disclaimer stating that Ms.
23 Florina was "in the 'testing the waters' phase of a possible candidacy." See Press Release,

1 *Former California Republican Party Chairmen Call Carly the Best Candidate to Take on Boxer,*
2 *available at <http://carlyforca.com/2009/09/former-crp-chairmen> (Sept. 25, 2009).*

3 The complaint also refers to public television and panel commentary appearances by
4 Fiorina, as well as Fiorina's "promotion" of a gathering of activists she hosted on or about
5 September 28, 2009, in Fresno, in which Fiorina allegedly publicized her intention to campaign
6 for U.S. Senate. The Fresno gathering appears to have been a cocktail reception that Fiorina
7 attended at the Fresno home of a businessman on September 28, 2009, the day after the
8 Republican state convention. See John Ellis, *Fiorina Actions at Issue: GOP Candidate Skips*
9 *Convention But Then Campaigns in Fresno*, FRESNO BEE, Sept. 30, 2009.³ Fiorina also met with
10 farmers and ranchers on September 28 at a ranch near Coalinga, California. See *id.* According
11 to a Fiorina spokeswoman, these appearances were examples of day trips during which Fiorina
12 met with donors and "policy people" and learned about the issues. See *id.*; see also Response at
13 2.

14 The complaint provides no information about what Fiorina may have said at either event.
15 Moreover, these events do not qualify as "general public political advertising," which includes
16 communications by broadcast, satellite or cable, newspaper, magazine, outdoor advertising
17 facility, mass mailings, phone banks, and Internet communications placed for a fee on another
18 website, all generally requiring payment to a third-party intermediary to reach the public.⁴ Nor
19 have we located information that either event was publicized through general public political

³ Fiorina reportedly did not attend the state convention, apparently because she was undergoing radiation treatments.

⁴ Cf. 2 U.S.C. § 431(22) and 11 C.F.R. § 100.26 (defining "public communication"); Internet Communications, 71 Fed. Reg. 18,589, 18,592, 18,594-595 (Apr. 12, 2006) (explaining that "any other form of general public political advertising" is a catch-all provision within the definition of "public communication" and that the common characteristics of the media enumerated as "public communications" were distribution of content through an entity owned or controlled by another person and payment through an intermediary to access the public through that medium).

1 advertising, such as mass mailings or newspaper ads in which Fiorina stated she intended to
2 campaign for U.S. Senate. In the absence of specific information about any statements made by
3 Fiorina at or in connection with those events, we cannot conclude that she had decided to
4 become a candidate and was no longer testing the waters at that time.

5 **3. Statements Referring to Fiorina as a Candidate**
6

7 The complaint alleges that Fiorina allowed and authorized statements by media sources
8 that referred to her as a U.S. Senate candidate and authorized statements on her website,
9 carlyforcalifornia.com, that "implied" she was a candidate. See 11 C.F.R. § 100.72(b)(3);
10 11 C.F.R. § 100.131(b)(3). The complaint also generally refers to statements made on
11 twitter.com/carlyforcalifornia and facebook.com/carlyfiorina.

12 Again, the complaint cites no specific oral or written statements made by Fiorina or
13 authorized by her that refer to her as a candidate for U.S. Senate before she announced her
14 candidacy on November 4, 2009. We found no written statements made or authorized by Fiorina
15 that referred to her as a candidate, including on the Twitter and Facebook accounts complainant
16 references.⁵ To the extent that complainant implies that statements by media sources such as
17 reporters or bloggers that refer to Fiorina as a candidate should be considered dispositive, we
18 have no information that Fiorina was involved in or authorized how any media source referred to
19 her.

20 The complaint alleges that the phrase "It's Carly vs. Boxer," part of a flash sequence that
21 appeared on Fiorina's website when it was launched on or about September 22, 2009, implied
22 that Fiorina was a Senate candidate. At that point, the website was comprised of a "teaser" flash

⁵ Accessible entries on the Twitter account and Facebook page cited begin on or after Fiorina formally announced her candidacy. As complainant does not identify the specific statements that he may have seen, there is no available information to support this allegation.

10044274117

1 sequence that read as follows: (screen 1) "It's day and night;" (screen 2) "It's cats and dogs;"
2 (screen 3) "It's Good and Bad;" (screen 4) "It's Carly vs. Boxer;" (screen 5) "Coming Soon?"
3 and (screen 6) "Carlyforniadreamin'!!!" The site offered visitors the option to "get involved" by
4 signing up for email and/or text updates and to donate. See YouTube: Worst Political Website
5 Ever #Carlyfornia by Carly Fiorina (video), and Kevin Yamura, *Fiorina Launches New Website;*
6 *Twitter Account*, SACRAMENTO BEE, Sept. 22, 2009. The website also apparently solicited
7 donations of up to \$2,400 from individuals and, as noted *supra* at p. 8, a bolded statement on the
8 site stated that "contributions are raised for testing the waters purposes only at this time."
9 Yamura, *supra*. This content, particularly the use of the question mark in the phrase "Coming
10 Soon?", appears consistent with Fiorina's professed intent to test the waters. The complaint
11 makes no other mention of statements on the website that refer to Fiorina as a candidate for U.S.
12 Senate.

13 One statement made during Fiorina's November 4, 2009, announcement arguably
14 suggests Fiorina may have taken actions indicating that she decided to become a candidate
15 earlier. Fiorina reportedly announced her candidacy to a small gathering of supporters, stating,
16 "If it isn't obvious to you by now, let me make it official today: I am a candidate to serve you as
17 your U.S. Senator." L.A. Now, *Carly Fiorina Announces her GOP Candidacy for U.S. Senate*,
18 L.A. TIMES, Nov. 4, 2009, available at [http://latimesblogs.latimes.com/lanow/2009/11/fiorina-](http://latimesblogs.latimes.com/lanow/2009/11/fiorina-announces-her-gop-candidacy-for-us-senate/comments/page/3)
19 [announces-her-gop-candidacy-for-us-senate/comments/page/3](http://latimesblogs.latimes.com/lanow/2009/11/fiorina-announces-her-gop-candidacy-for-us-senate/comments/page/3) (emphasis added). That statement
20 alone, however, is insufficient to support a legal conclusion that she became a candidate before
21 November 4, 2009. See MUR 5934 (Thompson) (Commission dismissed after a majority failed
22 to find reason to believe where significant funds were raised and candidate stated, *inter alia*,
23 "You're either running or not running. I think the steps we've taken are pretty obvious.")

1 Respondent acknowledges that Ms. Fiorina made numerous public and private
2 appearances in connection with exploring a possible Senate candidacy but states that she clearly
3 indicated she had made no decision to run and "conditioned her statements about [a] possible
4 candidacy." Response at 1-2. Two documented Fiorina appearances found in Internet searches
5 support Respondent's statements. At an appearance at the Web 2.0 Summit Dinner in San
6 Francisco on October 20, 2009, Fiorina discussed government technology policy and a possible
7 bid for the U.S. Senate but "said she was exploring the idea." Dean Takahashi, *Web 2.0: Carly*
8 *Fiorina Talks Potential Senate Run, Breast Cancer Battle, and Government Tech Policy*,
9 available at [http://venturebeat.com/2009/10/20/web-20-carly-fiorina-talks-potential-senate-run-](http://venturebeat.com/2009/10/20/web-20-carly-fiorina-talks-potential-senate-run-breast-cancer-battle-and-government-tech-policy)
10 [breast-cancer-battle-and-government-tech-policy](http://venturebeat.com/2009/10/20/web-20-carly-fiorina-talks-potential-senate-run-breast-cancer-battle-and-government-tech-policy) (Oct. 20, 2009). In an appearance on the cable
11 news show "Your World" in October 2009, Fiorina discussed the effectiveness of federal
12 economic stimulus legislation with the show's host as well as a possible U.S. Senate challenge
13 against incumbent Barbara Boxer. Fiorina stated that she was "exploring a run against Barbara
14 Boxer," and as a follow-up to the host's earlier comment about her cancer treatment and earlier
15 polling about possible candidates in the race, she noted that she had been "quiet for almost nine
16 months while I was dealing with an important health issue." She ended her comments by stating
17 that "if I move forward, I will move forward because I believe it's important to achieve a change
18 in the U.S. Senate and that I have a chance of beating her, but we'll see." She did not refer to
19 herself as a candidate in this television appearance. See Carly Fiorina with Fox News' Neil
20 Cavuto, available at <http://videos.spiccommunity.com/Video.Item.2609026500.html> (last visited
21 Mar. 20, 2010).

1 4. Length of Florina's Exploratory Activity

2 Finally, the complaint alleges that Florina conducted activities over a protracted period
3 of time and made no effort "to disclaim her efforts or intentions to run for U.S. Senate and
4 has in fact made commitments that she will be running and announcing." Again, however, the
5 complaint does not provide specific instances where Florina made commitments that she would
6 run or announce her candidacy, and the available information does not support that statement.

7 The complaint alleges that Florina became a candidate on or before September 25. The
8 complaint has provided no specific statement or activities either before or after this date to
9 support a conclusion that Florina had decided to become a candidate. The few examples of
10 general activities provided, such as the Fresno meeting and the website discussed above,
11 occurred in the 41-day period between September 25 and Florina's formal announcement on
12 November 4, 2009, which does not constitute a protracted time period. Cf. Advisory Opinion
13 1981-32 (engaging in proposed "testing the waters" activities beyond a period of several months
14 may affect the applicability of the exemption).

15 As for the complaint's claim that Florina failed to disclaim her "efforts or intentions" to
16 run for U.S. Senate, the Act and Commission regulations do not require an individual to disclaim
17 intentions to become a candidate for federal office to qualify for the "testing the waters"
18 exemption. Commission regulations suggest only that publicizing one's intentions to run for a
19 specific office through general public political advertising may indicate that a person has decided
20 to become a candidate. Implicit in the concept of "testing the waters" is that a candidate will
21 make known that she is exploring the possibility of running to "gauge the level of support that
22 may be achieved" and to determine the viability of a candidacy." See MUR 5934 (Thompson),

Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter, McGahn and Weintraub at 2.

5. Conclusion

Based on available information, it does not appear that Fiorina made or authorized any statements or engaged in any activity described in the "testing the waters" regulations to support a conclusion that she had decided to become a candidate for U.S. Senate and was no longer "testing the waters" before her formal announcement on November 4. Accordingly, we recommend that the Commission find no reason to believe that Fiorina violated the Act based on the allegations in the complaint.

III. RECOMMENDATIONS

1. Find no reason to believe that Cara Carleton ("Carly") Sneed Fiorina violated the Act.
2. Approve the attached Factual and Legal Analysis.
3. Approve the appropriate letters.
4. Close the file.

Thomasenia Duncan
General Counsel

4/16/10
Date

BY: 
Stephen Gura
Deputy Associate General Counsel
for Enforcement


Julie K. McConnell
Assistant General Counsel

1
2
3
4
5
6

Dawn M. Odrowaki
Dawn M. Odrowaki
Attorney

10044274122